

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

JEFFREY RICH AND KEELY RICH,

Plaintiffs,

v.

CIVIL ACTION NO.

AMERICAN RESOURCE MANAGEMENT,

Defendant.

**PLAINTIFFS' COMPLAINT AND DEMAND FOR JURY TRIAL**

JEFFREY RICH AND KEELY RICH ("Plaintiffs"), through their attorneys, allege the following against AMERICAN RESOURCE MANAGEMENT ("Defendant"):

**INTRODUCTION**

1. Plaintiffs' Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 *et seq.* (FDCPA).

2. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

**JURISDICTION AND VENUE**

3. Jurisdiction of this court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."

4. Defendant is headquartered in and conducts business in the state of Maryland, and therefore, personal jurisdiction is established.

5. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

**PARTIES**

6. Plaintiffs are natural people residing in Gambrills, Anne Arundel County, Maryland, and are obligated or allegedly obligated to pay a debt and are “consumers” as that term is defined by 15 U.S.C. 1692a(3).

7. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiffs.

8. Plaintiffs are informed and believe, and thereon allege, that Defendant is a corporation located in Cockeysville, Maryland.

9. Defendant is a collection agency that in the ordinary course of business, regularly, on behalf of itself or others, engages in debt collection.

**FACTUAL ALLEGATIONS**

10. Defendant places collection calls to Plaintiffs seeking and demanding payment for alleged debts originally owed to Baltimore Medical Center for medical services.

11. Defendant calls Plaintiffs at home at (410) 541-6030 and leaves voicemails to call Defendant at (443) 279-6020 x109, referencing account numbers 1699774 (Keely Rich) and 1629081 (Jeffrey Rich). These messages fail to disclose Defendant’s identity and, instead, state that Defendant is calling “for Baltimore Medical Center.”

12. In addition, Defendant’s voicemails do not disclose that it is a debt collector or calling for purposes of debt collection. (See Exhibit A - Transcripts).

**COUNT I**  
**DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT**

13. Defendant violated the FDCPA based on the following:

- a. Defendant violated §1692e(11) of the FDCPA by not disclosing to Plaintiffs that Defendant is a debt collector.

WHEREFORE, Plaintiffs, JEFFREY RICH AND KEELY RICH, respectfully request judgment be entered against Defendant, AMERICAN RESOURCE MANAGEMENT, for the following:

14. Statutory damages of \$1,000.00 pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*;
15. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*; and
16. Any other relief that this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED,

By: /s/ Fredrick Nix  
Fredrick Nix - Local Counsel  
Law Office of Fredrick E. Nix  
240 S Potomac Street  
Hagerstown, MD 21740

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Los Angeles, CA 90025  
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Fax: (866) 861-1390  
Attorneys for Plaintiff

**DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that Plaintiffs, JEFFREY RICH AND KEELY RICH, demand a jury trial in this case.

**VERIFICATION OF COMPLAINT AND CERTIFICATION**

(STATE OF MARYLAND

COUNTY OF ANNE ARUNDEL)

Plaintiff, JEFFREY RICH, states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, JEFFREY RICH, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

11/29/11

Date



JEFFREY RICH

**VERIFICATION OF COMPLAINT AND CERTIFICATION**

(STATE OF MARYLAND

COUNTY OF ANNE ARUNDEL)

Plaintiff, KEELY RICH, states the following:

8. I am the Plaintiff in this civil proceeding.
9. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
10. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
11. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
12. I have filed this Complaint in good faith and solely for the purposes set forth in it.
13. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
14. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, KEELY RICH, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

11/29/11  
Date

Keely Rich  
KEELY RICH